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VIA ELECTRONIC MAIL & ECF

The Honorable Lois H. Goodman, USMJ
402 E. State St. Rm 7050
Trenton, NJ 08608

**RE: Charles Murray, et al. v. Gerdau Ameristeel Corp., et al.
Docket No. 11-647**

Dear Judge Goodman:

As Your Honor is aware, this Firm represents Plaintiffs in the above-referenced matter. On March 1, with the assistance of Your Honor, the Parties reached a preliminary settlement which is to be sent to the Court for Your Honor's approval. The scheduling order entered by this Court provides that the joint motion should be filed one week from today, and the preliminary settlement approval and class certification hearing will be held on April 9.

Plaintiffs *require* certain information from Defendant to complete this process. The information required is extremely basic – the most recent hourly rates of class members and their hire/separation dates. The data which Plaintiffs need was requested *prior to* the March 1 settlement conference, and has been repeatedly requested since then – both in writing and in voicemails left to defense counsel. Nevertheless, as of today, Defendant has not provided same, and Defendant has been completely out of contact this week despite numerous written requests and phone calls being made by Plaintiffs' counsel to Defendant's counsel.

Plaintiffs accordingly seek this Court hold a telephone conference *urgently* as Plaintiffs are very concerned they will be unable to meet the deadlines set by the Court if Defendant does not provide the required data imminently. Further, the dates provided by this Court attempting to expediently resolve this matter is one of the most important factors in obtaining a significant number of class members' ultimate agreement to the settlement. Hence, if Defendant does not provide the data imminently, the entire settlement could be placed in jeopardy.

Accordingly, Plaintiffs request a brief and urgent telephone call with Your Honor to ensure that Defendant will comply with its obligations. Plaintiffs thank the Court for its consideration to this matter.



Respectfully Submitted,

/s/ Justin L. Swidler

Justin L. Swidler, Esq.

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